

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

INFINITE SOLUTIONS LLC,

Plaintiff,

v.

MIDWEST ADMINISTRATIVE SERVICES,
INC.,

Defendant.

Cause No.

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Infinite Solutions LLC, for its Complaint against defendant Midwest Administrative Services, Inc., states:

1. Plaintiff is an Indiana Limited Liability Company whose principal place of business is New Albany, Indiana.
2. Defendant is an Illinois corporation whose principal place of business is Maryland Heights, Missouri.
3. The Court has jurisdiction over this dispute pursuant to 28 U.S.C. § 1332 because the matter in controversy exceeds \$75,000 and the parties are citizens of different states. Venue is proper pursuant to 28 U.S.C. § 1391(b)(1).
4. Defendant executed an IT Services Contract with Plaintiff on February 18, 2015, under which Plaintiff provided information technology services for which Defendant was obligated to pay Plaintiff \$23,250 per month. A copy of the IT Services Contract is attached as Exhibit "1".
5. Plaintiff fully performed the IT Services Contract.

6. Defendant breached the IT Services Contract by failing to pay all amounts when due and abandoned the contract by switching to a different technology service company on September 4, 2015.

7. As of September 17, 2015, Defendant owed Plaintiff \$98,321.47 plus accrued finance charges of 1.5% per month as provided in the contract.

WHEREFORE, Infinite Solutions LLC requests this Court enter judgment against Midwest Administrative Services, Inc. in the amount of \$98,321.47, accrued and accruing monthly finance charges on the unpaid contract balance, and attorney's fees and costs; and provide such other and further relief as is just and proper.

Respectfully submitted,

/s/ Daniel D. Doyle

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